

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Appliance Recycling Centers of
America, Inc.,

File No. 18-CV-2832 (JRT/HB)

Plaintiff,

v.

**JOINT MOTION TO STAY PURSUANT
TO SETTLEMENT**

Protiviti Inc.,

Defendant.

Plaintiff Appliance Recycling Centers of America, Inc. and Defendant Protiviti, Inc. respectfully request that this matter be stayed for fourteen (14) days to allow the parties an opportunity to formally document their agreement in principle concerning a settlement reached on Wednesday, March 13, 2019. In further support of this motion, the parties state as follows:

1. This matter is presently set for hearing on defendant's Motion to Dismiss on Monday, March 18, 2019. (Dkt. 30.)
2. On Wednesday, March 13, 2019, the parties reached an agreement in principle to resolve this matter, subject to the drafting and execution of a formal settlement agreement.
3. The parties anticipate finalizing and executing a settlement agreement within the next fourteen (14) days, pursuant to which this matter will be dismissed with prejudice by stipulation of the parties.
4. Accordingly, the parties respectfully request that this case be stayed for fourteen (14) days.
5. The requested stay will allow the parties to focus their efforts on settlement and avoid this Court's unnecessary use of additional resources on this matter.

6. This motion is made in good faith and not for any improper purpose.

WHEREFORE, the parties respectfully request that the oral argument presently scheduled for Monday, March 18, 2019 be cancelled, and that this matter be stayed for fourteen (14) days.

Respectfully submitted,

Dated: March 13, 2019

/s/ Robert A. Chapman

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Dated: March 13, 2019

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